

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ONONDAGA

"JOHN DOE",

Plaintiff,

- against -

ROMAN CATHOLIC DIOCESE OF  
SYRACUSE, FATHER MICHAEL CARMOLA,  
and FATHER RICHARD MORISSETTE

Defendants.

Index No:

**PLAINTIFF'S AFFIDAVIT**

STATE OF NEW YORK)

:

COUNTY OF NEW YORK)

BEFORE ME, the undersigned authority, on this day personally appeared [REDACTED], known to me to be the person whose name is subscribed hereto, and who upon his oath deposed and stated as follows:

1. My name is [REDACTED]. I am over the age of eighteen and I am fully capable of making this affidavit. I am a resident of the State of New York. I have personal knowledge of all facts stated herein, which are true and correct.

2. I attended St. Mary's Parish School in Oswego in 1961 and attended Lourdes Camp in Skaneatles, New York in 1962.

3. In 1961, while a student at St. Mary's Parish School, Father James Moynihan (who is now deceased) visited my school. Father Moynihan asked for two volunteers and brought me and another boy into a room in the rectory. It was at this point that Father Moynihan violently abused me and forced his penis into my mouth. I was eight years old.

4. In 1962, my family moved to a new parish, St. John's Parish in Oswego, New York. In the summer between third and fourth grade, defendant Father Richard Morsette contacted my mother and stated that I had been accepted into a one week program at Lourdes Camp. My mother dropped me off at the headquarters of the Roman Catholic Diocese of Syracuse. Defendant Father Morsette, Father Francis Furfaro (now deceased), Father Moynihan

and an unidentified priest, were supposed to drive me to camp. Instead, they drove on back roads to a clearing in a field. They drugged me, then violently and repeatedly sexually abused me. One of them forced their penis into my mouth and ejaculated down my throat causing me to suffocate and black out. I was revived by Father Furfaro. Then Father Furfaro, Father Moynihan, and an unidentified priest took turns anally raping me while Father Morsette watched. After they finished raping me, a 9 year old boy, they took my bruised and battered body to camp. At the camp, Father Carmola crept into my bed and again raped me anally.

5. As a result of defendants' sexual abuse, I suffered and continue to suffer from physical, psychological and emotional injury. I have experienced feelings of guilt, loss of self-respect, shame, embarrassment, sadness, anger, depression, anxiety, alcohol abuse, and confusion resulting from their violent abuse. I have developed lifelong problems including but not limited to issues with authority, with forming, maintaining and developing relationships; with sex, and with being touched as a result of defendants' sexual attacks and rapes. I have experienced extreme emotional suffering including but not limited to nightmares, panic attacks and flashbacks.

6. This traumatic experience has caused me everlasting damage and I would like to preserve my privacy in this matter of a sensitive and highly personal nature. The identification of myself to my friends, family, and/or co-workers would certainly pose a risk to me of further mental harm, harassment, ridicule or personal embarrassment. It is for all these reasons that I would like this case to be brought under "John Doe".

Dated: 10/09/19



Sworn to before me this

9<sup>th</sup> day of October, 2019

Handwritten signature of Heather Lee Brown, Notary Public.

HEATHER LEE BROWN  
Notary Public, State of New York  
No. 01BR6195801  
Qualified in Wayne County  
Commission Expires Nov. 3, 2020